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March 10, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: In the Matter of Redevelopment of Spectrum to Encourage
Innovation in the Use of New Telecommunications
Technologies, ET Docket No. 92-9, RM-7981 and RM-8004

Dear Secretary Searcy:

Home Box Office, a Division of Time Warner Entertainment Company, L.P. ("HBO"), by its attorneys, hereby submits its supplemental comments in the above-referenced proceeding. On January 26, 1993, Alcatel Network Systems, Inc. ("Alcatel") filed Reply Comments in which it proposed a new rechannelization plan for the 3.7-4.2 GHz band, modifying the rechannelization plan initially proposed by the Federal Communications Commission ("Commission") in its Further Notice of Proposed Rulemaking.¹ In light of the fact that Alcatel presented its counterproposal in its Reply Comments, and given the voluminous nature of those Reply Comments, HBO and other fixed satellite service providers and users requested leave to file additional comments by March 10, 1993.² Based on a review of Alcatel's counterproposal

¹ In the Matter of Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, 7 F.C.C.Rcd 6100 (1992) ("FNPRM").

² Request for Leave to File Additional Comments, filed by GE American Communications, Inc., GTE Spacenet Corporation, HBO, Hughes Communications Galaxy, Inc., National Public Radio, Inc. and the Satellite Broadcasting and Communications Association on February 8, 1993.

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by HBO's engineers and technical personnel, HBO is unable to support Alcatel's modified rechannelization plan.

The Commission in its FNPRM designated five bands above 3 GHz as possible spectrum into which 2 GHz microwave users might relocate if they were to be displaced by emerging technologies. In addition to the 3.7-4.2 GHz band, the Commission proposed other bands at 6, 10 and 11 GHz.


Alcatel's modified rechannelization plan would encourage any displaced 2 GHz user requiring narrowband channels with bandwidths from 400 kHz to 10 MHz to relocate to the 3.7-4.2 GHz band, instead of spreading the relocation burden among all five of the identified relocation bands.

It should be noted that HBO has never objected to accommodating any potentially displaced 2 GHz users in the 3.7-4.2 GHz band so long as those users require 20 MHz channel capacity as contemplated by the existing frequency plan. In addition, HBO believes that introducing narrowband channels into the 3.7-4.2 GHz band, as proposed by Alcatel's modified plan, is especially problematic in light of the recent move to use digital compression for satellite delivery of video programming in the 3.7-4.2 GHz band.

While HBO appreciates Alcatel's efforts to resolve the problems presented by the Commission's initial proposal to rechannelize the 3.7-4.2 GHz band, it submits that the introduction of narrowband channels as proposed by Alcatel would be harmful to existing fixed satellite users. Accordingly, HBO is opposed to the Alcatel counterproposal.

Respectfully submitted,

Home Box Office,
a Division of Time Warner
Entertainment Company, L.P.


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